

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

FLAME S.A.,

Plaintiff,

vs.

**m/v LYNX, her engines, freights, apparel,
appurtenances, tackle, etc., in rem,**

Defendant.

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Civil Action No. 1:10-CV-00278-RC

IN ADMIRALTY

NOTICE OF CROSS MOTION TO AMEND VERIFIED COMPLAINT

PLEASE TAKE NOTICE that Plaintiff FLAME S.A. upon the attached memorandum of law in opposition to the motion to vacate and in support of plaintiff's cross motion to amend verified complaint, along with the declarations of William R. Bennett, III and Graeme Lloyd, will move this Court, both for the Honorable Ron Clark, in courtroom ___, United States District Court, Eastern District of Texas, United States Courthouse, 300 Willow Street, Suite 221, Beaumont Texas 77701, at a date and time to be determined by the Court, for an Order denying the motion to vacate the warrant of arrest and granting plaintiff's request to amend the complaint.

Dated: Beaumont, Texas
May 17, 2010

CALVERT EAVES CLARKE & STELLY, L.L.P.



By: _____

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